

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION

THOMAS HART,

Plaintiff,

v.

TYSON FRESH MEATS, INC.,

Defendant.

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CASE NO. 1:22-cv-138

NOTICE OF REMOVAL

TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA

The above-named Defendant hereby gives notice of removal of Case No. LACV146584 from the Iowa District Court for Black Hawk County to the United States District Court for the Northern District of Iowa, Eastern Division. In support thereof, Defendant states as follows:

1. On or about October 24, 2022, a civil action was commenced in the Iowa District Court for Black Hawk County captioned *Thomas Hart v. Tyson Fresh Meats, Inc.*, Black Hawk County Case No. LACV146584. True and correct copies of the Original Notice and Petition are attached hereto as Exhibit A.

2. Defendant has not yet been served.

3. Plaintiff is a citizen of the State of Iowa.

4. Defendant is incorporated in Delaware with its principal place of business in Arkansas.

5. Plaintiff and Defendant are citizens of different states, and they are wholly diverse.

6. Jurisdiction over actions between citizens of diverse states is vested in this Court pursuant to 28 U.S.C. sections 1332 and 1441.

7. Defendant removed this action within thirty (30) days of being served the Original Notice and Petition. This Notice of Removal is timely filed pursuant to 28 U.S.C. Section 1446.

Dated: November 21, 2022

Respectfully submitted,

BELIN McCORMICK, P.C.

/s/ Kelsey J. Knowles

Michael R. Reck AT0006573

Kelsey J. Knowles AT0004233

666 Walnut Street, Suite 2000

Des Moines, IA 50309-3989

Telephone: (515) 283-4645

Facsimile: (515) 558-0645

Email: mrreck@belinmccormick.com

kjknowles@belinmccormick.com

ATTORNEYS FOR DEFENDANT

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